

Message

From: Keller, Kaitlin [keller.kaitlin@epa.gov]
Sent: 5/28/2019 1:50:11 PM
To: Beck, Nancy [Beck.Nancy@epa.gov]; Dunn, Alexandra [dunn.alexandra@epa.gov]; Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]
CC: Tyler, Tom [Tyler.Tom@epa.gov]; Hanley, Mary [Hanley.Mary@epa.gov]
Subject: RE: For review, due COB Thurs 5/23 -- DEFENSE Questions for the Record on SEPW PFAS Hearing from March 28

Okay thanks Nancy. We'll send these on to OCIR with that additional edit.

From: Beck, Nancy
Sent: Tuesday, May 28, 2019 9:22 AM
To: Keller, Kaitlin <keller.kaitlin@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>
Cc: Tyler, Tom <Tyler.Tom@epa.gov>; Hanley, Mary <Hanley.Mary@epa.gov>
Subject: RE: For review, due COB Thurs 5/23 -- DEFENSE Questions for the Record on SEPW PFAS Hearing from March 28

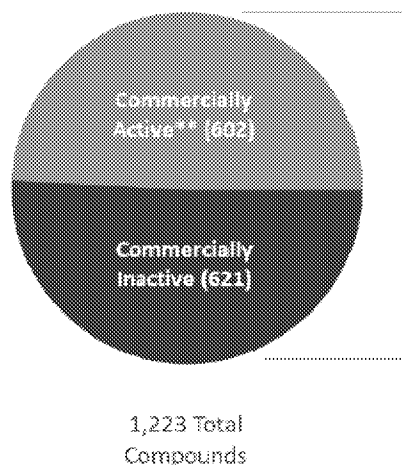
Lets have the edit say hundreds of manufactured PFAS. I think that will resolve it. thanks.

Nancy B. Beck, Ph.D., DABT
Principal Deputy Assistant Administrator, OCSPF
P: 202-564-1273
beck.nancy@epa.gov

From: Keller, Kaitlin
Sent: Tuesday, May 28, 2019 9:11 AM
To: Beck, Nancy <Beck.Nancy@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>
Cc: Tyler, Tom <Tyler.Tom@epa.gov>; Hanley, Mary <Hanley.Mary@epa.gov>
Subject: RE: For review, due COB Thurs 5/23 -- DEFENSE Questions for the Record on SEPW PFAS Hearing from March 28

Thanks Nancy. To address your question on if there are thousands instead of hundreds. Per the PFAS Action Plan, there are 602 PFAS active in commerce and 1223 on the TSCA inventory. (See below) Let me know if "hundreds" is still okay to go with. If there are no other questions/comments we'll send these forward.

PFAS on the TSCA Inventory*



EPA Actions

- MARCH 2002: Significant New Use Rule (SNUR) requiring notification to the EPA before any future manufacture (including import) of 13 PFAS chemicals
- DECEMBER 2002: SNUR for additional 75 PFAS chemicals
- OCTOBER 2007: SNUR for additional 183 PFAS chemicals
- JANUARY 2010: Amendment of Polymer Exemption Rule to exclude certain PFAS polymers
- 2010-2015: PFOA Stewardship Program—reduce long-chain PFAS emissions and product content by 95%; by 2015 reduce long-chain PFAS emissions and product content by 100%. All participating companies met the program goals.
- OCTOBER 2013: SNUR for additional PFAS chemicals
- JANUARY 2015: Proposed SNURs for additional PFAS chemicals

* The TSCA inventory is a list of chemical substances approved for U.S. commerce. The original inventory was compiled from substances reported under the 1978 TSCA Inventory Reporting Rule, and substances have been added since via a continuous Premanufacture Notice.

** Substances on the TSCA inventory currently designated as commercially active are those reported under the retrospective reporting requirements of the TSCA inventory Notification (Active/Inactive) rule. These substances were in U.S. commerce at some point between June 2006 and June 2016.

From: Beck, Nancy

Sent: Wednesday, May 22, 2019 5:41 PM

To: Keller, Kaitlin <keller.kaitlin@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>

Cc: Tyler, Tom <Tyler.Tom@epa.gov>

Subject: RE: For review, due COB Thurs 5/23 -- DEFENSE Questions for the Record on SEPW PFAS Hearing from March 28

A few comments on our OPPT comments. not sure its worth others spending time to review.
Thanks.

Nancy B. Beck, Ph.D., DABT

Principal Deputy Assistant Administrator, OCSP

P: 202-564-1273

beck.nancy@epa.gov

From: Keller, Kaitlin

Sent: Wednesday, May 22, 2019 4:06 PM

To: Dunn, Alexandra <dunn.alexandra@epa.gov>; Beck, Nancy <Beck.Nancy@epa.gov>; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>

Cc: Tyler, Tom <Tyler.Tom@epa.gov>; Malloy, Ruth <malloy.ruth@epa.gov>

Subject: FW: For review, due COB Thurs 5/23 -- DEFENSE Questions for the Record on SEPW PFAS Hearing from March 28

OPPT's broader comments on the DoD PFAS QFRs are below, and two minor comments are in the attached. (Unless you are inclined to review the entire set of questions/answers, you can skip to pages 4-6.) OCIR has requested comments by COB tomorrow 5/23. Please let me know if these are cleared to send on and if you have any additional comments.

Ruth-please print the email below and pages 4-6 of the attached for the binder and folders.

Thanks,
Kaitlin

From: Scheifele, Hans

Sent: Wednesday, May 22, 2019 3:40 PM

To: Keller, Kaitlin <keller.kaitlin@epa.gov>; Pierce, Alison <Pierce.Alison@epa.gov>

Cc: Tyree, JamesN <tyree.jamesn@epa.gov>; Henry, Tala <Henry.Tala@epa.gov>

Subject: RE: For review, due COB Thurs 5/23 -- DEFENSE Questions for the Record on SEPW PFAS Hearing from March 28

Hi Kaitlin,

We don't have detailed comments on this but there are some minor comments in the attached and one broader comment - Many of the questions ask broadly about PFAS yet the responses vary but refer to only PFOS, PFOS/PFOA or in one case PFOS/PFOA and PFBS. We recommend greater clarity in the responses and for the responses regarding water testing, that DoD describe somewhere in the document what DoD actually tests for.

We would also note that there seems to be a transcription error or misstatement in Maureen's March 2019 testimony when we compared her previous testimony in September 2018 and with regard to which PFAS are still active in commerce for AFFF. AFFF containing PFOS and PFOA, other than in potential trace amounts, is no longer manufactured or available for purchase in the United States. However, existing stocks of AFFF may contain PFOS and, in some formulations, PFOA. See the comparison below.

From September 2018: <https://www.hsgac.senate.gov/imo/media/doc/Sullivan%20Testimony.pdf>

DoD's limited use of PFAS started in the 1970s, with the introduction of AFFF for aircraft fuel fire-fighting purposes. AFFF may contain PFOS and, in some formulations, PFOA. AFFF is mission-critical because it quickly extinguishes petroleum-based fires, which is why the Federal Aviation Administration has also adopted its use at airports nationally. AFFF containing PFOS, other than in potential trace amounts, is no longer manufactured or available for purchase in the United States, although legacy stocks of these AFFF remain.

From March 2019:

[https://www.epw.senate.gov/public/_cache/files/6/7/67c68fd5-51cc-428a-84b3-](https://www.epw.senate.gov/public/_cache/files/6/7/67c68fd5-51cc-428a-84b3-d1e5ba24003a/A3FA1B8E226E7F10059BAF4452A4A938.sullivan-testimony-03.28.2019.pdf)

[d1e5ba24003a/A3FA1B8E226E7F10059BAF4452A4A938.sullivan-testimony-03.28.2019.pdf](https://www.epw.senate.gov/public/_cache/files/6/7/67c68fd5-51cc-428a-84b3-d1e5ba24003a/A3FA1B8E226E7F10059BAF4452A4A938.sullivan-testimony-03.28.2019.pdf)

DoD's limited use of PFAS started in the 1970s, with the introduction of AFFF for aircraft fuel fire-fighting purposes. Current sales of AFFF may contain PFOS and, in some formulations, PFOA. AFFF is mission-critical because it quickly extinguishes petroleum-based fires, which is why the Federal Aviation Administration also adopted its use at airports nationally. AFFF containing PFOS, other than in potential trace amounts, is no longer manufactured or available for purchase in the United States, although legacy stocks of these AFFF remain.

Hans Scheifele

Special Assistant

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202.564.3122 (office) | Scheifele.hans@epa.gov

From: Keller, Kaitlin

Sent: Tuesday, May 21, 2019 2:31 PM

To: Scheifele, Hans <Scheifele.Hans@epa.gov>; Pierce, Alison <Pierce.Alison@epa.gov>

Cc: Tyree, JamesN <tyree.jamesn@epa.gov>

Subject: FW: For review, due COB Thurs 5/23 -- DEFENSE Questions for the Record on SEPW PFAS Hearing from March 28

Hans—See below and attached. Please coordinate OPPT review and send any comments tomorrow/edits tomorrow NLT 4pm. Reminder that any comments on the CDC/NIH QFRs need to be submitted to the IO today.

Thanks,
Kaitlin

From: Skane, Elizabeth

Sent: Tuesday, May 21, 2019 1:40 PM

To: Spraul, Greg <Spraul.Greg@epa.gov>; Keller, Melanie <Keller.Melanie@epa.gov>; Linkins, Samantha <Linkins.Samantha@epa.gov>; Tyree, JamesN <tyree.jamesn@epa.gov>; Folkemer, Nathaniel <Folkemer.Nathaniel@epa.gov>; Lubetsky, Jonathan <Lubetsky.Jonathan@epa.gov>; Hubbard, Carolyn <Hubbard.Carolyn@epa.gov>; Hanley, Mary <Hanley.Mary@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>

Cc: Kaiser, Sven-Erik <Kaiser.Sven-Erik@epa.gov>; Moody, Christina <Moody.Christina@epa.gov>; Frye, Tony (Robert) <frye.robert@epa.gov>; Haman, Patricia <Haman.Patricia@epa.gov>; Levine, Carolyn <Levine.Carolyn@epa.gov>

Subject: For review, due COB Thurs 5/23 -- DEFENSE Questions for the Record on SEPW PFAS Hearing from March 28

Hi PFAS team, we've got DOD QFRs for review from the 3/28 hearing (*in overlap with the CDC and NIH ones due tomorrow—thanks for your work on those*). Please send me any comments/suggested edits by **COB Thursday 5/23**. OMB's note:

Attached are draft responses by the Department of Defense to Questions for the Record following the March 28, 2019 hearing before the Senate Environment and Public Works Committee on DoD's actions to address the presence of PFAS substances. I also am attaching a copy of the final testimony for your reference.

Please provide your edits and comments by the deadline above. If you do not respond by the deadline, I will assume that you have no comments.

Thanks,
Elizabeth

Elizabeth Skane ♦ 202.564.5696
US Environmental Protection Agency
Office of Congressional Affairs
WJC North 3443S